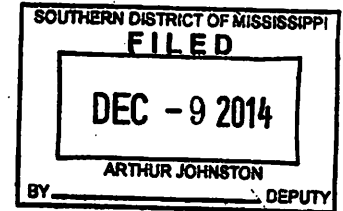


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



UNITED STATES OF AMERICA

v.

LAKEESHA NIX
a/k/a Lakeesha Watson

CRIMINAL NO. *3:14CF138DPS-FKB*
18 U.S.C. § 641
18 U.S.C. § 1028A
18 U.S.C. § 287

The Grand Jury Charges:

COUNT 1

1. Beginning on or about January 24, 2012, and continuing until on or about at least May 8, 2014, in Rankin County in the Northern Division of the Southern District of Mississippi and elsewhere, the defendant, **LAKEESHA NIX a/k/a Lakeesha Watson**, aided and abetted by others known and unknown to the Grand Jury, did steal, purloin and knowingly convert to her own use and to the use of another, greater than \$1,000.00 in funds belonging to the United States of America by receiving fraudulently obtained federal tax refunds, to which the defendant **LAKEESHA NIX a/k/a Lakeesha Watson** knew she was not entitled.

All in violation of Sections 641 and 2, Title 18, United States Code.

COUNTS 2-6

2. On or about the dates listed below, in Rankin County in the Northern Division of the Southern District of Mississippi and elsewhere, the defendant, **LAKEESHA NIX a/k/a Lakeesha Watson**, knowingly used without lawful authority a means of identification of another person, during and in relation to a violation of Section 641, Title 18, United States Code, to wit, theft of public money.

COUNT	TAXPAYER VICTIM	DATE FILED	REFUND CLAIMED
2	R.G.	01/24/2012	\$7,430.00
3	K.E.	2/16/2012	\$7,909.00

4	J.K.	2/15/2012	\$2,014.00
5	A.M.	4/30/2012	\$6,321.00
6	B.Y.	5/08/2012	\$6,574.00

All in violation of Sections 1028A and 2, Title 18, United States Code.

COUNTS 7-11

3. On or about the dates listed below, in Rankin County in the Northern Division of the Southern District of Mississippi and elsewhere, the defendant, **LAKEESHA NIX a/k/a Lakeesha Watson**, and others known and unknown to the grand jury, made and presented and caused to be made and presented to the IRS claims against the United States for payment of a refund of taxes, which Defendant **NIX** then and there knew to be false, fictitious, and fraudulent. Defendant **NIX** made the claims by preparing and causing to be prepared, and presenting and causing to be presented to said agency, U.S. Individual Income Tax Returns, Forms 1040, for the individuals and approximate amounts described below knowing that the claim was false, fictitious, and fraudulent in that the named individual was not entitled to the refund which was being requested:

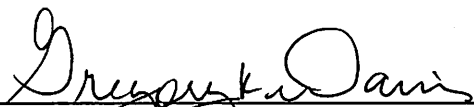
COUNT	TAXPAYER VICTIM	DATE FILED	REFUND CLAIMED
7	R.G.	01/24/2012	\$7,430.00
8	K.E.	2/16/2012	\$7,909.00
9	J.K.	2/15/2012	\$2,014.00
10	A.M.	4/30/2012	\$6,321.00
11	B.Y.	5/08/2012	\$6,574.00

All in violation of Sections 287 and 2, Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

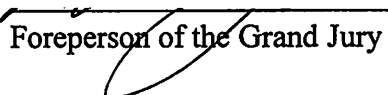
4. As a result of committing the offenses alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Section 981(a)(1)(C), Title 18, United States Code and Section 2461, Title 28, United States Code.



GREGORY K. DAVIS
United States Attorney

A TRUE BILL:



Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 9th day of DECEMBER, 2014.



UNITED STATES MAGISTRATE JUDGE